

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE
2005 JAN 18 P 3:1

STEVEN CABRAL,
Plaintiff

CIVIL ACTION NO: 04-CV-11961MEL U.S. DISTRICT COURT
DISTRICT OF MASS

vs.

STONE CONTAINER CORPORATION,
Defendant

**PLAINTIFF STEVEN CABRAL'S INITIAL DISCLOSURE PURSUANT TO FED.
R. CIV.P.26 (A) (1)**

Pursuant to Fed. R. Civ. P. 26 (a) (1) (A)-(D) and Local Rule 26.2 (A), the plaintiff, Steven Cabral, hereby makes the required initial disclosure:

A. Individuals likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings.

1. Steven Cabral
12 Deer Hill Avenue
Plymouth, MA
2. Paul Grobski
79 Gaslight Lane
North Easton, MA

Mr. Grobski was the on-site Manager for System Freight, Inc. at Stone Container's Mansfield, MA location. Mr. Grobski may have witnessed Mr. Cabral's accident.

B. Documents, data compilations and tangible things within plaintiff's possession, custody or control.

The plaintiff has produced copies of the following documents:

1. Income tax returns for 1999 though 2003
2. Shields MRI record and bill
3. Morton Hospital and Medical Center records
4. Gursewak S. Sandu, M.D. records

5. Owen R. McConville, M.D. records
6. Jeffrey J. Adam, D.C. records
7. George Ousler, M.D. Report
8. Industrial Accident Board Records

C. Damages Computation

1. Medical Records
2. Tax Returns

Respectfully Submitted
Plaintiff, Steven Carbral by his Attorney


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